

JOHN DEERE HARVESTER WORKS

1100 13TH AVENUE, EAST MOLINE, ILLINOIS 61244-1497 U.S.A.



RESPONSE TO 5/3/91 CIL

14 June 1991

Mr. Joe Miller
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

RE: 1618100015 Rock Island County
John Deere Harvester Works/East Moline
ILD 025423054
Compliance Inquiry Letter

Dear Mr. Miller:

Attached is the response of the John Deere Harvester Works/East Moline relative to an Environmental Protection Agency "RCRA" inspection on 10 April 1991.

If you have further questions pertaining to our responses, please contact me at (309)765-6385.

D.J. Napel
D. J. Napel
MGR., Quality & Materials Engineering
910610LJB/01/jgp5
ATTACHMENTS

c: J. F. Baldus
R. G. Kleine
M. E. McGuire, Env. Control, Deere & Company
D. E. Schloz

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EPA Region 5 Records Ctr.



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Response to compliance inquiry letter, dated 31 May 1991.

Violation of Section 725.116(c) - The facility has not conducted an annual review of initial training.

There was an oversight that the training provided to employees who frequently handle hazardous waste was not provided in 1990. This was due to personnel changes in the environmental area. We have hired a consultant to improve our initial training program for our employees who frequently handle special and hazardous waste. This firm was contracted in March 1991. We expect to be finished with this project, including classroom training, by 8 July 1991. However, in 1990, each supervisor reviewed the Hazardous Waste Standard Operating Procedures (SOP's) were reviewed with their employees who handle hazardous waste.

Violation of Section 725.116(d) - Maintenance of documents and records.

For all employees of John Deere Harvester Works/East Moline, a job title and job description is maintained in our Personnel Department. Exhibit A shows those employees involved in hazardous waste management, their job classification and assignment as it pertains to Title 35, Section 725.116(d).

These employees received the training outlined in Exhibit B. This training will be the basis for the annual review.

Violation of Section 722.134(c) - Unlabeled drum in satellite accumulation area.

This was an oversight. The drum of waste, Xylene, has been labeled "Hazardous Waste". The responsible persons have been advised of the rules and regulations that requires the hazardous waste label be placed on the drum when the first amount of hazardous waste is placed into the drum.

Violation of Section 728.107(a)(6) - Retention of Land Disposal Restriction Notice.

This was an oversight. A copy of the Landband Disposal Restriction is now on file.

EXHIBIT A

EMPLOYEE	JOB CLASSIFICATION	ASSIGNMENT
W Alexander	Flow Coat Painter	Operate & maintain Spray paint systems
D Anderson	Yard & Factory Laborer	Clean paint booths
RL Bebout	Supervisor	Supervise paint booth cleaners
DK Becker	Lab Tech	Water treatment analysis
L J Breitbach	Enviromental Coordinator	Impliment & coordinate EPA compliance
DL Clevenger	Supervisor	Supervise facility maintenance
JD Cummings	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
DL Filbert	Supervisor	Supervise Powerhouse & water treatment plant
D Grafton	Coal Conveyor Tender	Handle coal ash
PM Gramling	Advanced Engr Analyst	Oversee header paint system operations
CM Hawkins	Supervisor	Supervise paint stripping operation
S Jackson	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
RE John	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
W Johnston	Power House Helper	Operate industrial waste water pre-treatment plant
D Kermeen	Paint Stripper	Operate thermal & caustic paint stripping equipment
GL Langwith	Supervisor	Supervisor of Spray Paint System
A Larison	Central Coolant System Operator	Handle & recycle machining coolant
KB Melton	Supervisor	Develop & maintain EPA compliance plans
F Mendoza	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
DJ Napel	Manager	Manage EPA compliance
MB O'Brien	Supervisor	Supervisor of Spray Paint System
R Owens	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
JG Pastruczak	Clerk Typist	Type manifests & related documents
R Rumph	Flow Coat Painter	Operate & maintain Spray paint systems
C Shuh	Central Coolant System Operator	Handle & recycle machining coolant
H Stubbs	Paint Preparer	Move & store special & hazardous waste
R Sundquist	Tractor Driver-Yard & Factory	Refuse waste hauler
MR Sussex	Senior Engineer	Supervise EPA compliance
KC Thompson	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
NM Turnquist	Chemist	Waste analysis & compliance assistance
DL Urbatsch	Supervisor	Supervise E-Coat paint system operation
J Walters	E-Coat Paint System Operator	Operate & maintain E-Coat paint system
CF Wilcox	Supervisor	Supervise Powerhouse & water treatment plant
RN Wilks	Supervisor	Supervise coolant recycling

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4 HOUR RCRA TRAINING SESSION

JOHN DEERE HARVESTER WORKS East Moline, Illinois

June, 1991

**Instructor: Sally S. Smith, M.P.H.
Training Coordinator: K.B. Melton**

AGENDA

- I. Introductions and Objectives of Training**
- II. RCRA and OSHA Regulations**
 - **What is a Hazardous Waste?**
 - **What is a Special Waste?**
- III. Characteristics and Hazards Associated with Wastes**
- IV. Overview of Personal Protective Equipment Available for Some Job Tasks**
- V. Overview of Job Descriptions and Job Safety Analyses**
- VI. Workshop Updating Your Job Description**
Updating Your Job Safety Analyses
- VII. John Deere's Contingency Plan/Emergency Action Plan**
 - **Current Status of Response Efforts**
 - **Your Role — Awareness Level Responders**
- VIII. Spill Control and Fire Control Techniques**